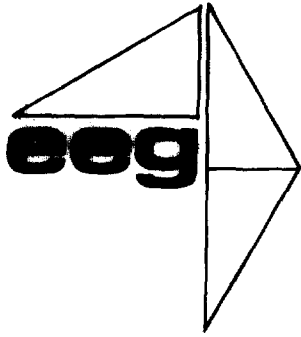


OET



eeeg enterprises, inc.

1 rome street • farmingdale, n.y. 11735 • 516-293-7472

November 11, 1994

William F. Caton, Secretary
1919 M St., N.W., Room 222
Federal Communications Commission
Washington, DC 20554

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NOV 14 1994

FEDERAL MAIL ROOM

Re: RM - 8533

Dear Mr. Caton,

Enclosed are the original and eleven copies of EEG's comments on the Petition for Rulemaking requesting Amendment of the Commissions's Rules Relating to Closed Captioning Decoders.

Very truly yours,

EEG Enterprises, Inc.

William Posner
President

WP/mmp

No. of Copies rec'd O+11
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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NOV 14 1994

In the Matter of

Amendment of Section 15.119
of the Commission's Rules
Relating to Closed Captioning
Decoders

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RM - 8533

FCC MAIL ROOM

COMMENTS OF EEG ENTERPRISES, INC.

EEG Enterprises, Inc. ("EEG") hereby responds to the Commission's proposal to amend Section 15.119(l) of the Commission's rules so as to eliminate the requirement that the closed captioning decoders of television receivers be compatible with the copy protection techniques of Eidak Corporation. EEG supports the change in rules that would eliminate that requirement.

I. **BACKGROUND**

EEG has been involved in the Line 21 Closed Captioning system since 1979. We have been continuously participating in the system development and equipment manufacture for the Line 21 system since then. Almost all transmissions of Line 21 Closed Captioning information since the start of broadcasting in 1980 has been done through EEG encoders.

EEG has designed a family of low cost, integrated circuit Line 21 decoder solutions for television and VCR applications. These designs have been licensed to Motorola and Zilog who have manufactured and sold them to a significant portion of the television receiver and VCR market. New designs, implementing the extended features introduced by other FCC rule making, are currently entering production.

EEG is a member of the Consumer Electronics Group of the Electronics Industries Association ("EIA/CEG") and of the EIA Television Data Systems Subcommittee ("TDSS"). EEG is also a member of the National Association of Broadcasters ("NAB"). EEG has actively participated in the deliberations of the TDSS in its efforts to improve and expand the knowledge and usefulness of closed-captioning.

II DISCUSSION

As designers of Decoder ICs for use in television receivers and VCRs, EEG has been intimately involved in providing cost effective solutions that meet the FCC requirements specified for Line 21 closed captioning. The present EEG implementations, currently in wide use, are compatible with signals utilizing the Eidak copy protection technology to the extent that they can correctly decode and display captions contained within that signal, although with some display movement. Current FCC rules require full compatibility with the Eidak copy protection technology starting in January 1, 1995¹. EEG's new decoder products are fully compatible with the Eidak that technology as the current rules require. Never-the-less, EEG is in favor of the proposed modifications to the rules expressed in this action.

¹ Amendment of Part 15 of the Commissions's Rules to Implement the Provisions of the Television Decoder Circuitry Act of 1990, GEN Docket No. 91-1, FCC 92-157, Released April 9, 1992 (Memorandum, Opinion and Order)


During the earlier rule making associated with the Television Decoder Act of 1990, EEG expressed reservations to the FCC about the need to be compatible with the Eidak copy protection technology. From our personal discussions with former executives of Eidak, it became clear that Eidak Corporation was no longer in operation as a viable entity. Further, it was stated that only one customer had the system and that customer was not using the system and not likely to do so in the future.

Eidak has had a number of years to make it's technology a factor in the marketplace. In the past the Commission felt that Eidak was deserving of the opportunity to market its pre-existing technology in spite of the attendant increased complexity of caption decoders. In view of the reversal of Eidak's fortunes and the lack of commercial impact of the technology, EEG believes that it is not necessary to mandate this increased complexity to support a copy protection system that in all probability will never be used.

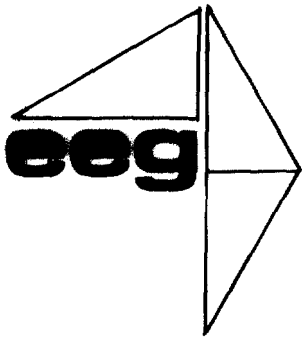
EEG supports the EIA/CEG petition that the Commission amend the rules to eliminate the requirement that television receiver closed captioning decoders be compatible with the Eidak copy protection technology.

Respectfully submitted,

EEG ENTERPRISES, INC.

By 
William Posner, President

1 Rome Street
Farmingdale, New York 11735
November 11, 1994



eeeg enterprises, inc.

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CERTIFICATE OF SERVICE

FOUNDRY ROOM

I, William Posner hereby certify that I have this day served a copy of EEG ENTERPRISES, INC.'s Comments by first-class mail, postage prepaid upon the petitioner Joseph P. Markoski.

Dated at Farmingdale, New York this 11th of November, 1994.

William Posner